RQ-2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 2014

JOHN M. ROBINSON, TREASURER
CITIZENS FOR COCHRAN
PO BOX 7183
TUPELO, MS 38802

Response Due Date
09/03/2014

IDENTIFICATION NUMBER: C00091892

REFERENCE: 12 DAY PRE-RUN-OFF REPORT (05/15/2014 - 06/04/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Senate Public Records Office by the response date noted above. Failure to adequately respond by the response date noted above could result in an audit or enforcement action**. Additional information is needed for the following **5** item(s):

1. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of $1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of $1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of $1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

2. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address and purpose of disbursement. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

3. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Contract Labor." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf. A non-exhaustive list of acceptable purposes is also available on the FEC website at http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf.

4. Schedule B supporting Line 17 of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of $200 in an election cycle, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)

5. Schedule B of your report discloses reimbursements to individuals for the following disbursement(s): "Reimbursed Expenses - Campaign Walkers." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of $200 in an election cycle, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will**

not be considered.

A written response or an amendment to your original report(s) correcting the above problems should be filed with the Senate Public Records Office. Please contact the Senate Public Records Office at (202) 224-0322 for instructions on how and where to file an amendment. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1166.

Sincerely,

Bradley Matheson

Bradley Matheson
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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Missing 48-Hour Notices
Citizens for Cochran (C00091892)

Contributor Name	Date	Amount	Election
INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE	5/21/14	$1,000.00	P, 2014
PROFESSIONAL INSURANCE AGENTS POLITICAL ACTION COMMITTEE	5/28/14	$1,000.00	P, 2014
COMPETITIVE CARRIERS ASSOCIATION PAC (CCA PAC)	5/30/14	$1,000.00	P, 2014
MORTGAGE BANKERS ASSOCIATION POLITICAL ACTION COMMITTEE	5/30/14	$1,000.00	P, 2014
BATTLE, PAUL III	5/31/14	$1,500.00	P, 2014